

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS ANTITRUST : Master File No. 12-md-02311
LITIGATION : Honorable Marianne O. Battani

ALL PARTS :

THIS DOCUMENT RELATES TO:
ALL CASES :

SUPPLEMENT TO MOTION TO MODIFY STIPULATED ORDER OF DISCOVERY

End-Payor Plaintiffs (“EPPs”) hereby provide this supplement to their motion to modify the stipulated order of discovery (ECF No. 783). The motion had identified Fujikura Ltd. (“Fujikura”) and Furukawa Electric Co. (“Furukawa”) as defendants with whom EPPs were unable to meet and confer.

In fact, Fujikura corresponded by e-mail with EPPs to inquire what was sought from Fujikura that had not been previously provided in its interrogatory responses in the *Wire Harness* case (Case No. 212-cv-00100), and EPPs confirmed that they were not seeking anything further from Fujikura. Fujikura did not take any position on EPPs’ proposed modification of the stay.

Furukawa corresponded by e-mail with EPPs to state that, in its opinion, EPP’s request was moot as to Furukawa based on its representation that it had already provided this information to EPPs. EPPs do not believe their request is moot, as the information Furukawa provided was incomplete and never supplemented. For these reasons, EPPs’ motion properly names Furukawa as a defendant with whom EPPs were unable to meet and confer because,

beyond its e-mail, Furukawa ignored other attempts made by EPPs to meet and confer on the relief we sought per Local Rule 7.1.

Date: August 27, 2014

Respectfully submitted,

/s/ Elizabeth Tran

Frank C. Damrell
Steven N. Williams
Adam J. Zapala
Elizabeth Tran
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
fdamrell@cpmlegal.com
swilliams@cpmlegal.com
azapala@cpmlegal.com
etran@cpmlegal.com

/s/ Hollis Salzman

Hollis Salzman
Bernard Persky
William V. Reiss
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
601 Lexington Avenue, Suite 3400
New York, NY 10022
Telephone: (212) 980-7400
Facsimile: (212) 980-7499
hsalzman@rkmc.com
bpersky@rkmc.com
wvreiss@rkmc.com

/s/ Marc. M. Seltzer

Marc M. Seltzer
Steven G. Sklaver
SUSMAN GODFREY L.L.P.
1901 Avenue of the Stars, Suite 950
Los Angeles, CA 90067-6029
Telephone: (310) 789-3100
Facsimile: (310) 789-3150
mseltzer@susmangodfrey.com
ssklaver@susmangodfrey.com

Terrell W. Oxford
Warren T. Burns
SUSMAN GODFREY L.L.P.
901 Main Street, Suite 5100
Dallas, Texas 75202
Telephone: (214) 754-1900
Facsimile: (214)754-1933
toxford@susmangodfrey.com
wburns@susmangodfrey.com

*Interim Co-Lead Class Counsel for the Proposed
End-Payor Plaintiffs Classes*

/s/ E. Powell Miller
E. Powell Miller
Adam T. Schnatz
THE MILLER LAW FIRM, P.C.
The Miller Law Firm, P.C.
950 W. University Dr., Ste. 300
Rochester, Michigan 48307
epm@millerlawpc.com
ats@millerlawpc.com

*Attorneys for Plaintiffs and Interim Liaison Counsel
for the Proposed End-Payor Plaintiffs Classes*

CERTIFICATE OF SERVICE

I, Steven N. Williams, hereby certify that I caused a true and correct copy of the **SUPPLEMENT TO MOTION TO MODIFY STIPULATED ORDER OF DISCOVERY** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on August 27, 2014.

/s/ Steven N. Williams

Steven N. Williams